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July 1, 2014

BY EMAIL AND ECF

Honorable Thomas P. Griesa
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Marie Laurette Dussault v. Republic of Argentina, No. 06 Civ. 13085 (TPG)

Dear Judge Griesa:

I write in response to plaintiff's June 17, 2014 letter and accompanying motion papers in the above-captioned action, which ask the Court to enter a *pari passu* injunction identical in substance to the injunction obtained by NML Capital, Ltd. on November 21, 2012. Because the plaintiff is a post-judgment creditor, her motion raises new issues that were not presented to the Court in the prior *pari passu* proceedings.

Plaintiff's motion is one of several requests for relief the Court and the Republic have recently received in connection with the *pari passu* clause. At the hearing on Friday, the Court quite rightly held that it would defer consideration of "me-too" motions to avoid a flood of additional claims at this juncture. The Republic believes the same reasoning applies with even greater force here, where plaintiff's motion raises new issues of substantive law.

Honorable Thomas P. Griesa, p. 2

Accordingly, the Republic opposes plaintiff's motion and respectfully requests that all briefing proceed in accordance with a schedule agreed upon by the parties.

Respectfully submitted,



Carmine D. Boccuzzi

cc: Counsel of Record (by email)